



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

William Collins  
Superintendent  
17 7 0449

DEC 21 1993

4WD-RCRA

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James C. Brown, Manager  
Environmental Technology  
Olin Chemicals  
P.O. Box 248  
Lower River Road  
Charleston, Tennessee 37310

SUBJ: Clean Closure Equivalency Demonstration  
Olin Chemicals/McIntosh Plant Site  
McIntosh, Alabama  
EPA ID. No. ALD 008 188 708

Dear Mr. Brown:

The U. S. Environmental Protection Agency (EPA) has completed a review of the Clean Closure Equivalency Demonstration Report which you submitted on September 30, 1993. As required, the Olin Corporation, McIntosh Plant (Olin) performed sampling to determine whether the following units [which closed according to 40 Code of Federal Regulations (CFR) Part 265 (Interim Status)] met the more stringent 40 CFR Part 264 (Owner/Operator) closure standards:

- ° the Stormwater Pond,
- ° the Brine Filter Backwash Pond,
- ° the Pollution Abatement (pH) Pond, and
- ° the Mercury Waste Pile Storage Pad;

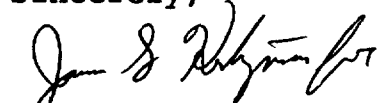
The soil sampling data indicates that there has been a significant reduction in contaminants: for example, mercury concentrations during 1985 ranged from 0.002 parts per million (ppm) to 4100 ppm, and in 1993 the mercury concentrations ranged from 0.11 ppm to 1.1 ppm.

Due to the extensive nature of the former process areas, it remains unclear whether natural attenuation and the pumping effects of the existing groundwater recovery system are responsible for the reductions in concentration or whether the former closure actually achieved the 40 CFR 264 closure standards.

Regardless, it appears that the minimum equivalency standards have been achieved. Prior to final approval, the document will be placed on Public Notice to allow for public comment. You will be notified when the Public Notice is published.

Should you have questions regarding this matter, please contact Ms. Lael Butler of the RCRA Branch, Permitting Section at 404/347-3433.

Sincerely,



Joseph R. Franzmathes  
Director  
Waste Management Division

cc: Tony Odom, Olin Chemicals/McIntosh Plant Site  
Sue Robertson, ADEM